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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JAMIE COLLAZO MUNOZ
Defendant

CASE NO. 3:21-cr-00010-MMD-CLB

**Stipulation for Extension of Time to File Fed.
R. Crim. Pro. 29(c) Motion (Second Request)**

It is hereby stipulated and agreed, by and between Jason Frierson, United States Attorney for the District of Nevada, and Andolyn Johnson and Andrew Keenan, Assistant United States Attorneys, and Jacqueline Tirinnanzi, Esq. and Kathleen Bliss, Esq., counsel for Jamie Collazo Munoz, that good cause exists for the Court to extend the deadline for defense counsel to file its Fed. R. Crim. P. 29(c) motion for judgment of acquittal by 14 days from October 21, 2022 to November 4, 2022.

A guilty verdict was returned on September 16, 2022. ECF No. 153. Under Rule 29(c)(1), a motion must be filed within 14 days of a guilty verdict, resulting in the original deadline being no later than September 30, 2022. Defense counsel initially requested various trial transcripts at an expediated rate from the court reporter who was present for the duration of the trial. However, due to the volume of transcripts requested within a short timeframe and the court reporter being occupied with another trial beginning the week of September 26, 2022, production of the

1 requested transcripts before September 30, 2022 was an overly burdensome and impracticable
2 request. An extension of 21 days was granted, resulting in the current deadline of October 21,
3 2022, to allow for production of the trial transcripts. At this point, all requested transcripts have
4 been produced, but due to other competing obligations counsel require additional time to review
5 transcripts and continue preparation of Mr. Munoz's Rule 29 motion, and request an additional
6 14 days.

8 Denial of this request for an extension of time would deny counsel for Mr. Munoz the
9 ability to effectively and accurately prepare his Rule 29(c) motion, which is critical to
10 preservation of appellate issues.

11 Therefore, the parties respectfully stipulate, subject to the Court's approval:

12 The due date for defendant's motion for judgment of acquittal under Rule 29 should be
13 extended to November 4, 2022;

15 The government's response should be filed no later than November 23, 2022; and

16 The defendant's reply should be filed on or before November 30, 2022.

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19 /s/ Andolyn Johnson
Andolyn Johnson
20 Assistant U.S. Attorney

/s/Jacqueline Tirinnanzi
Jacqueline Tirinnanzi
Counsel for Jamie Collazo Munoz

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22 Dated this 19th day of October, 2022.

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24 **IT IS SO ORDERED.**

25 
26 **HONORABLE MIRANDA M. DU**
27 **CHIEF UNITED STATES DISTRICT JUDGE**

28 **DATED:** October 20, 2022